

SILLS CUMMIS & GROSS P.C.

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 22-14539 (JKS)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON SEPTEMBER 13, 2022 AT 10:00 A.M. (ET)**

CONTINUED MATTERS

1. Debtors' Motion for Entry of an Order (A) Establishing Deadlines to File Proofs of Claim Against and Interests in the Debtors, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (B) Approving the Form and Manner of Notice of the Bar Dates, (C) Authorizing Publication of the Bar Dates, and (D) Granting Related Relief [Docket No. 314; Filed 8/15/22]

Response Deadline: 9/6/22 at 4:00 p.m. (ET)

Response(s) Received: None.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

Status: The Debtors have requested that the Court adjourn this matter to September 27, 2022 at 2:00 p.m.

2. Secured Creditor, IPFS Corporation's Notice of Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) & Related Relief [Docket No. 236; Filed 8/3/22]

Response Deadline: 8/23/22

Response(s) Received: None.

Related Document(s):

a) Adjournment Request [Docket No. 377; Filed 8/29/22]

Status: The Debtors and the movant are in discussions regarding this motion. The motion will either be withdrawn or adjourned to a date to be determined.

CONTESTED MATTERS

3. Debtors' Motion for Entry of an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 83; Filed 6/28/22]

Response Deadline: 7/12/22 at 4:00 p.m. (ET); extended to 7/14/22 for the Committee

Response(s) Received:

a) Omnibus Objection of Allen Cvelic and Martina Gudac to (I) Debtors' Motion for Entry of an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business, (II) Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Certain Construction Contracts and (III) Joinder in the United States Trustees' Objection to the Retention of Sills Cummis & Gross P.C. as Counsel for the Debtors [Docket No. 117; Filed 7/11/22]

b) Joinder of Thomas J. Cioffe, Cioffe Enterprises, Inc., Thomas J. Cioffe, JR., Joseph Occhiogrosso, and Annemarie Occhiogrosso to the Omnibus Objection of Allen Cvelic and Martina Gudac to (1) Debtors' Motion for Entry of an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business, (II) Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Certain Construction Contracts and (III) Joinder in the United

States Trustees' Objection the Retention of Sills Cummis & Gross P.C. as Counsel for the Debtors [Docket No. 122; Filed 7/11/22]

- c) CORRECTED Joinder of Thomas J. Cioffe, Cioffe Enterprises, Inc., Thomas J. Cioffe, Jr., Joseph Occhiogrosso, and Annemarie Occhiogrosso to the Omnibus Objection of Allen Cvelic and Martina Gudac to (I) Debtors' Motion for Entry of an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business, (II) Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume Certain Construction Contracts and (III) Joinder in the United States Trustees' Objection the Retention of Sills Cummis & Gross P.C. as Counsel for the Debtors [Docket No. 123; Filed 7/11/22]
- d) Notice of Withdrawal of Docket No. 122 [Docket No. 128; Filed 7/13/22]
- e) Committee Statement on Pending Motions [Docket No. 142; Filed 7/13/22]

Related Document(s):

- a) Notice of Hearing and Objection Deadlines [Docket No. 86; Filed 6/28/22]
- b) Certification of Service [Docket No. 91; Filed 6/29/22]
- c) Notice of Revised Proposed Order with Respect to Debtors' Motion for Entry of an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 356; Filed 8/24/22]
- d) Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 369; Filed 8/26/22]
- e) Order Vacating Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 383; Filed 8/30/22]

Status: Though designated on this agenda as a contested matter, the Debtors expect this matter to go forward on an uncontested basis in light of the changes made to the proposed order submitted by the Debtors at Docket No. 356.

4. Notice of Motion for Order Compelling Performance and/or Assumption of Agreements and for Related Relief [Docket No. 125; Filed 7/12/22]

Response Deadline: 7/19/22 at 2:00 p.m. (ET)

Response(s) Received:

- a) Debtors' Objection to U.S. Construction, Inc.'s Motion to Compel Performance and/or Assumption of Agreements and for Related Relief [Docket No. 222; Filed 8/1/22]
- b) Objection of the Official Committee of Unsecured Creditors to the Motion of U.S. Construction, Inc. for an Order Compelling Performance and/or Assumption of Agreements [Docket No. 231; Filed 8/2/22]
- c) Reply to Opposition to Motion to Compel Performance and/or Assumption of Agreements and for Related Relief [Docket No. 249; Filed 8/5/22]

Related Document(s):

- a) Application for Order Shortening Time [Docket No. 126; Filed 7/12/22]
- b) Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Docket No. 145; Filed 7/14/22]

Status: The Court adjourned this matter to September 13, 2022. The parties are in discussions regarding the U.S. Construction agreements. In light of these discussions, the Debtors have requested that movant adjourn this matter. As of the filing of this agenda, no response has been received.

ADVERSARY PROCEEDING NO. 22-01166

5. Plaintiff's Request for Entry of Final Judgment by Default For Sum Certain [Docket No. 9; Filed 8/19/22]

Response Deadline: N/A

Response(s) Received: None.

Related Document(s):

- a) Notice of Hearing [Docket No. 14; Filed 8/25/22]
- b) Notice of Withdrawal of Plaintiff's Request for Entry of Final Judgment by Default for Sum Certain Against Olena Budinska [Docket No. 19; Filed 9/9/22]
- c) Plaintiff's Request for Entry of Final Judgment Against All Defendants by Default for Sum Certain [Docket No. 21; Filed 9/9/22]

Status: This matter has been withdrawn. Additional proofs were filed by the Plaintiff, renewing the request for entry of a default judgment at a future hearing.

6. Plaintiff's Request for Entry of Final Judgment by Default For Sum Certain [Docket No. 10; Filed 8/19/22]

Response Deadline: N/A

Response(s) Received: None.

Related Document(s):

- a) Notice of Hearing [Docket No. 13; Filed 8/25/22]
- b) Notice of Withdrawal of Plaintiff's Request for Entry of Final Judgment by Default for Sum Certain Against Thomas "Nick" Salzano [Docket No. 20; Filed 9/9/22]
- c) Plaintiff's Request for Entry of Final Judgment Against All Defendants by Default for Sum Certain [Docket No. 21; Filed 9/9/22]

Status: This matter has been withdrawn. Additional proofs were filed by the Plaintiff, renewing the request for entry of a default judgment at a future hearing.

Dated: September 9, 2022

SILLS CUMMIS & GROSS P.C.

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